

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION**

**BIANCA FLETCHER**

**PLAINTIFF**

**vs.**

**CASE NO. 4:20-CV-521-LPR**

**NITV, LLC; NITV FEDERAL SERVICES, LLC;  
CHARLES HUMBLE; GENE SHOOK; and  
JOHN DOES 1-2**

**DEFENDANTS**

**MOTION TO FILE A SURREPLY AND REQUEST FOR A HEARING**

**COMES NOW** THE PLAINTIFF, by and through counsel, who for her Motion to File a Surreply and Request for a Hearing, states:

1. Defendant filed a Reply, premised on the idea that Plaintiff failed to comply with Rule 56(d). This is false.
2. Accordingly, Plaintiff moves to file a Surreply, attached as Exhibit A.
3. This motion is not filed for purposes of harassment or delay.
4. Plaintiff has consulted with opposing counsel who does not object to a Surreply.
5. This case is in an unusual procedural status, with an early motion for summary judgment filed, before discovery is complete, that contains numerous fact issues. Accordingly, Plaintiff requests a hearing.

**WHEREFORE**, Plaintiff prays for an Order granting his Motion to file a Surreply, and for a hearing on the Motion for Summary Judgment.

Respectfully submitted,

**Lucien R. Gillham, ARBN 99-199**

Attorneys for the Plaintiff

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